

Times Wang

From: Ennis, Felicia <FEnnis@wbny.com>
Sent: Thursday, May 8, 2025 8:26 AM
To: Times Wang; Steven Schneebaum; Justin Butterfield; Lea Patterson (lea@butterfieldpatterson.com); Terri Marsh; Hallinan, Meghan
Cc: Adam Farra; Mariyam Hussain; Michael Dell'Angelo; Michaela L. Wallin
Subject: RE: Chang v. Shen Yun Performing Arts., Inc., et al.; No. 7:24-cv-08980 (PMH) (S.D.N.Y.)

Dear Mr. Wang:

IBC has reviewed Plaintiff's allegations concerning John Doe. We do not agree that there is any basis for Mr. Doe to proceed with a pseudonym against IBC nor do we believe it is appropriate where no evidence has been presented that he is at any risk of harm or harassment.

Regards,



Felicia Ennis | Partner
Warshaw Burstein, LLP
575 Lexington Avenue, 7th Floor
New York, NY 10022 · www.wbny.com
d 212-984-7753 | f 212-972-9150
E-Mail: Fennis@wbny.com



This email and any attachments are solely for the confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or act in reliance on it or any attachments. If you received this email by mistake, please notify us immediately by email, and promptly delete this email and any attachments.

The attorney-client and work product privileges are not waived by the transmission of this email.

From: Times Wang <twang@farrawang.com>
Sent: Wednesday, May 7, 2025 11:06 PM
To: Steven Schneebaum <sms@smslawdc.com>; Ennis, Felicia <FEnnis@wbny.com>; Justin Butterfield <justin@butterfieldpatterson.com>; Lea Patterson (lea@butterfieldpatterson.com) <lea@butterfieldpatterson.com>; Terri Marsh <terri.marsh.hrlf@gmail.com>; Hallinan, Meghan <MHallinan@wbny.com>
Cc: Adam Farra <afarra@farrawang.com>; Mariyam Hussain <mhussain@bm.net>; Michael Dell'Angelo <mdellangelo@bm.net>; Michaela L. Wallin <mwallin@bm.net>
Subject: Re: Chang v. Shen Yun Performing Arts., Inc., et al.; No. 7:24-cv-08980 (PMH) (S.D.N.Y.)

Warning: Unusual sender <twang@farrawang.com>

You don't usually receive emails from this address. Make sure you trust this sender before taking any actions.

Counsel,

Just following up on this. We intend to file our motion papers tomorrow.

Thank you,
Times

Times Wang | [Farra & Wang PLLC](#)
(202) 505-6227 | twang@farrawang.com
1534 Champa St., Ste. 400, Denver, CO 80202
1300 I St. NW, Ste. 400E, Washington, DC 20005

From: Times Wang
Sent: Tuesday, May 6, 2025 7:41:17 PM
To: Steven Schneebaum <sms@smslawdc.com>; Ennis, Felicia <FEnnis@wbny.com>; Justin Butterfield <justin@butterfieldpatterson.com>; Lea Patterson (lea@butterfieldpatterson.com) <lea@butterfieldpatterson.com>; Terri Marsh <terri.marsh.hrlf@gmail.com>; Hallinan, Meghan <MHallinan@wbny.com>
Cc: Adam Farra <afarra@farrawang.com>; Mariyam Hussain <mhussain@bm.net>; Michael Dell'Angelo <mdellangelo@bm.net>; Michaela L. Wallin <mwallin@bm.net>
Subject: Chang v. Shen Yun Performing Arts., Inc., et al.; No. 7:24-cv-08980 (PMH) (S.D.N.Y.)

Counsel,

As you know, the second amended complaint includes a plaintiff who seeks to proceed under the pseudonym John Doe. Mr. Doe intends to file a formal motion requesting permission to do so in the next day or two. Portions of that motion will include information that will reveal his identity, and so he also intends to seek permission to file such portions under seal.

Can you please let me know whether your clients consent to Mr. Doe's request to proceed under a pseudonym, at least at the pleading stage? We are willing to revisit the issue if and when discovery opens.

Can you please also let me know whether you consent to Mr. Doe's request to file identifying information under seal?

Thank you,

Times Wang | [Farra & Wang PLLC](#)
(202) 505-6227 | twang@farrawang.com
1543 Champa St., Ste 400, Denver, CO 80202
1300 I St. NW, Ste 400E, Washington, DC 20005

NOTICE: This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If you are not the intended recipient of this message, or the employee or agent responsible for delivering this message to the intended recipient, you are advised that any dissemination, distribution or copying of this message, or acting on the information contained herein, may be a violation of applicable law and is strictly prohibited. If you have received this message in error, please notify the sender immediately by replying to this message.